

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_

v. : DATE FILED: \_\_\_\_\_

WADE LARIBO	:	VIOLATIONS: 21 U.S.C. §846
a/k/a "E"	:	(Conspiracy to distribute more than 50
IAN THOMAS	:	grams of crack cocaine)
CLARENCE HULSINGER	:	(1 count)
STANLEY JACKSON and	:	21 U.S.C. §841(a)(1)
ALBERT ROBINSON	:	(Possession with intent to distribute crack
	:	cocaine)(4 counts)
	:	21 U.S.C. §860
	:	(Possession with intent to distribute crack
	:	cocaine within 1000 feet of a public
	:	elementary school)(3 counts)
	:	21 U.S.C. §841(a)(1)
	:	(Distribution of crack cocaine)(2 counts)
	:	21 U.S.C. §860
	:	(Distribution of crack cocaine within 1000
	:	feet of a public elementary school)(2 counts)
	:	18 U.S.C. §924(c)
	:	(Possession of firearms in furtherance of a
	:	drug trafficking crime)(2 counts)
	:	18 U.S.C. §922(g)(1)
	:	(Possession of firearms by a convicted felon)
	:	(1 count)

**INDICTMENT**

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

From on or about October 8, 2002 through on or about October 10, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendants

WADE LARIBO,  
a/k/a "E,"  
IAN THOMAS,  
CLARENCE HULSINGER,  
STANLEY JACKSON and  
ALBERT ROBINSON

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute more than 50 grams, that is, approximately 137 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**MANNER AND MEANS**

It was a part of the conspiracy that:

1. The defendants were members of a drug distribution organization that sold cocaine base ("crack")("crack cocaine") on the unit block of North Paxon Street in Philadelphia.
2. The organization used various locations on North Paxon Street and elsewhere to store crack cocaine and proceeds from the sale of crack cocaine.
3. Various members of the conspiracy would transport crack cocaine from storage locations to the selling locations on North Paxon Street and would transport cash

proceeds from the sales of crack cocaine from the selling locations on Paxon Street to other locations.

4. Various members of the conspiracy used locations in Philadelphia, including 21 North Paxon Street, 25 North Paxon Street, 15 South 51<sup>st</sup> Street and 18 North Conestoga Street, to store crack cocaine and cash proceeds from the sale of crack cocaine, and to package crack cocaine for sale on the unit block of North Paxon Street.

5. Various members of the conspiracy possessed firearms in order to protect their crack cocaine operation, including safeguarding the crack cocaine and the cash proceeds from the sale of crack cocaine.

#### OVERT ACTS

1. On or about October 8, 2002, on the unit block of North Paxon Street, defendants IAN THOMAS and STANLEY JACKSON, acting with at least one other person known to the grand jury, sold crack cocaine to various customers.

2. On or about October 9, 2002, on the unit block of North Paxon Street, defendant STANLEY JACKSON sold crack cocaine to various customers.

3. On or about October 9, 2002, defendant STANLEY JACKSON handed money from crack cocaine sales to defendant WADE LARIBO and to a juvenile, known to the grand jury.

4. On or about October 9, 2002, defendant WADE LARIBO transported money from crack cocaine sales to 18 North Conestoga Street in Philadelphia.

5. On or about October 10, 2002, on the unit block of North Paxon Street, defendants STANLEY JACKSON and ALBERT ROBINSON sold crack cocaine to customers.

6. On or about October 10, 2002, defendant ALBERT ROBINSON handed money from crack cocaine sales to defendant WADE LARIBO.

7. On or about October 10, 2002, defendant STANLEY JACKSON possessed approximately 13 clear ziplock packets containing a total of approximately 1.227 grams of crack cocaine and approximately 110 clear ziplock packets containing a total of approximately 9.95 grams of crack cocaine.

8. On or about October 10, 2002, inside 21 North Paxon Street, defendant ALBERT ROBINSON possessed approximately 22 clear ziplock packets containing a total of approximately 1.97 grams of crack cocaine.

9. On or about October 10, 2002, inside 15 South 51<sup>st</sup> Street in Philadelphia, defendant IAN THOMAS possessed approximately 105.4 grams of crack cocaine, a loaded Smith and Wesson .357 revolver and a Bryco Jennings .380 semiautomatic pistol.

10. On or about October 10, 2002, inside 18 North Conestoga Street in Philadelphia, defendants CLARENCE HULSINGER and WADE LARIBO possessed approximately 16.62 grams of crack cocaine, approximately \$2,255 in proceeds from the sale of crack cocaine, drug packaging material, electronic scales, a loaded Smith and Wesson 9mm semiautomatic pistol, a loaded Taurus 44 Magnum revolver, a loaded Intratec 9mm semiautomatic pistol, a loaded Mossberg .410 caliber shotgun and a loaded Glock 10mm semiautomatic pistol.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendant

STANLEY JACKSON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of  
cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21 United States Code, Sections 841(a)(1) and 841(b)(1)(C) .

**COUNT THREE**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 8, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

STANLEY JACKSON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkway Gamma School, a public elementary school located at 4901 Chestnut Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) .

In violation of Title 21, United States Code, Section 860(a).

**COUNT FOUR**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendant

STANLEY JACKSON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of  
cocaine base ("crack"), a Schedule II Controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) .

**COUNT FIVE**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendant

STANLEY JACKSON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkway Gamma School, a public elementary school located at 4901 Chestnut Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) .

In violation of Title 21, United States Code, Section 860(a).



**COUNT SIX**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendant

STANLEY JACKSON

knowingly and intentionally possessed with intent to distribute in excess of 5 grams, that is,  
approximately 11.17 grams, of a mixture or substance containing a detectable amount of cocaine  
base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT SEVEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

STANLEY JACKSON

knowingly and intentionally possessed with the intent to distribute more than 5 grams, that is approximately 11.17 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkway Gamma School, a public elementary school located at 4901 Chestnut Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a).

**COUNT EIGHT**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendants

WADE LARIBO,  
a/k/a "E," and  
CLARENCE HULSINGER,

inside 18 North Conestoga Street, knowingly and intentionally possessed with intent to distribute,  
and aided and abetted the possession with intent to distribute of, more than 5 grams, that is,  
approximately 16.62 grams, of a mixture or substance containing a detectable amount of cocaine  
base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)  
and Title 18, United States Code, Section 2.

**COUNT NINE**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendants

WADE LARIBO,  
a/k/a "E," and  
CLARENCE HULSINGER

knowingly possessed, and aided and abetted the possession of, a firearm, that is, (1) a Glock 10mm model 29 semiautomatic pistol, Serial #CKT583, loaded with 9 live rounds, (2) a Smith and Wesson 9mm model #5906 semiautomatic pistol, Serial # TCK6231, loaded with 14 live rounds, (3) a Taurus 44 magnum revolver, Serial # OH313633, loaded with 4 live rounds, (4) an Intratec 9mm semiautomatic pistol Model AB-10, Serial # A000520, loaded with 20 live rounds and (5) a Mossberg Model 500E .410 caliber shotgun, with an obliterated serial number, loaded with 4 live rounds, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute a controlled substance as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

CLARENCE HULSINGER,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, (1) a Glock 10mm model 29 semiautomatic pistol, Serial #CKT583, loaded with 9 live rounds, (2) a Smith and Wesson 9mm model #5906 semiautomatic pistol, Serial # TCK6231, loaded with 14 live rounds, (3) a Taurus 44 magnum revolver, Serial #OH313633, loaded with 4 live rounds, (4) an Intratec 9mm semiautomatic pistol Model AB-10, Serial # A000520, loaded with 20 live rounds and (5) a Mossberg Model 500E .410 caliber shotgun, with an obliterated serial number, loaded with 4 live rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT ELEVEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendant

IAN THOMAS

knowingly and intentionally possessed with intent to distribute more than 50 grams, that is,  
approximately 105.5 grams, of a mixture or substance containing a detectable amount of cocaine  
base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT TWELVE**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

IAN THOMAS

knowingly and intentionally possessed with intent to distribute more than 50 grams, that is, approximately 105.4 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkway Gamma School, a public elementary school located at 4901 Chestnut Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) .

In violation of Title 21, United States Code, Section 860(a).

**COUNT THIRTEEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

IAN THOMAS

knowingly possessed a firearm, that is, a Smith and Wesson 357 revolver, serial number S305424, loaded with six live rounds, and a Bryco Jennings .380 semiautomatic pistol, with an obliterated serial number, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute a controlled substance as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1).



**COUNT FOURTEEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of  
Pennsylvania, defendant

ALBERT ROBINSON

knowingly and intentionally possessed with the intent to distribute a mixture or substance  
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) .

**COUNT FIFTEEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

ALBERT ROBINSON

knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Parkway Gamma School, a public elementary school located at 4901 Chestnut Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) .

In violation of Title 21, United States Code, Section 860(a).

### **NOTICE OF FORFEITURE**

1. As a result of the violations of Title 18, United States Code, Sections 924(c), as set forth in Counts Nine and Thirteen, and of Title 18, United States Code Section 922(g)(1), as set forth in Count Ten of this Indictment, the defendants WADE LARIBO, CLARENCE HULSINGER and IAN THOMAS shall forfeit to the United States all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (1) a Glock 10mm model 29 semiautomatic pistol, Serial #CKT583, loaded with 9 live rounds;
- (2) a Smith and Wesson 9mm model #5906 semiautomatic pistol, Serial Number TCK6231 loaded with 14 live rounds;
- (3) a Taurus 44 magnum revolver, Serial #OH313633 loaded with 4 live rounds;
- (4) an Intratec 9mm semiautomatic pistol Model AB-10, Serial # A000520 loaded with 20 live rounds;
- (5) a Mossberg Model 500E .410 caliber shotgun with an obliterated serial number, loaded with 4 live rounds;
- (6) a Smith and Wesson 357 revolver, Serial # S305424, loaded with six live rounds; and
- (7) a Bryco Jennings .380 semiautomatic pistol with an obliterated serial number.

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c),

2. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1) and 860, set forth in Counts One, Two through Eight, Eleven, Twelve, Fourteen and Fifteen of this Indictment, the defendants WADE LARIBO, IAN THOMAS, CLARENCE

HULSINGER, STANLEY JACKSON and ALBERT ROBINSON shall forfeit to the United States of America:

a. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations of Title 21, United States Code, as charged in this Indictment, including, but not limited to, the following items seized by the police on or about October 10, 2002:

- 1) a Glock 10mm model 29 semiautomatic pistol, Serial #CKT583, loaded with 9 live rounds;
- 2) a Smith and Wesson 9mm model #5906 semiautomatic pistol, Serial Number TCK6231 loaded with 14 live rounds;
- 3) a Taurus 44 magnum revolver, Serial #OH313633 loaded with 4 live rounds;
- 4) an Intratec 9mm semiautomatic pistol Model AB-10, Serial # A000520 loaded with 20 live rounds;
- 5) a Mossberg Model 500E .410 caliber shotgun with an obliterated serial number, loaded with 4 live rounds;
- 6) a Smith and Wesson 357 revolver, Serial # S305424, loaded with six live rounds; and
- 7) a Bryco Jennings .380 semiautomatic pistol with an obliterated serial number.

b. any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this Indictment, including, but not limited to, the following cash seized by the police on or about October 10, 2002:

- 1) \$149 from STANLEY JACKSON;
- 2) \$41 from ALBERT ROBINSON;
- 3) \$121 from 25 N. Paxon Street;
- 4) \$404 from WADE LARIBO;
- 5) \$2255 from 18 N. Conestoga Street.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

---

FOREPERSON

---

PATRICK L. MEEHAN  
*United States Attorney*